

Table 2. Potential Editing/Drafting Revisions to 5th Draft Delta Plan Text

Comment source, chapters covered, page numbers	Major Comment Theme or Recommendations	Staff Proposed changes for 6 th staff draft Delta Plan
General structure, organization and content of 5th draft Delta Plan		
5th draft plan comments, ISB, DPC-ESP Applies to all chapters	1. There is a lack of cohesion, integration and structure within draft Plan.	Staff agrees with many of these comments and proposes the following changes: <ul style="list-style-type: none"> - Reorganizing chapters within the plan for better flow and integration - Merging chapters 2 and 3 for better integration of governance, science and implementation of the Delta Plan - More consistency of organization within chapters
	2. The draft Delta Plan is not a plan, does not provide framework and process near-term or over the next 88 years.	Staff agrees with some of these comments and proposes the following changes: <ul style="list-style-type: none"> - Include a more extensive discussion of how the Delta Plan functions as a plan and provides framework for near and long-term actions - Inclusion of more specific objectives within the Plan - Include a timeline that indicates when major plans/projects will be completed to implement of the Delta Plan
	3. Performance measures need significant revisions, concerns about vague or imprecise language.	Staff agrees with these comments and proposes the following changes: <ul style="list-style-type: none"> - Refine language for administrative performance measures with dates or timelines for completion, where relevant - Refine language for driver and outcome measures included in the draft plan - Add process for further development after

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		adoption of the plan
Adaptive Management and the Delta Plan.		
5 th draft plan comments, ISB, DPC-ESP Chapter 2, pp. 37-44	4. Better description of how this process will be applied to the development of the Delta Plan is required.	Staff agrees with this and proposes the following changes: - Include narrative explaining the adaptive management approach of the Delta Plan. Staff suggests combining Chapters 2 and 3 to illustrate application of adaptive mgmt. strategy to Delta Plan
Chapters 4-8, pages vary	5. Concerns that adaptive management is not well applied throughout plan; need to identify science needs; need improved performance measures	Staff agrees with this and proposes the following changes: - Clarify discussion in final draft regarding; adaptive management application; identifying science needs; description of performance measures. Add project-level examples of adaptive mgmt. into narrative.
Emphasis of Delta as Place		
5 th staff draft, ESP (specifically Delta Counties, DPC, Delta Conservancy) Chapters 1 and 8, general comment	6. The Delta Plan needs more emphasis on Delta as Place.	Staff agrees with these comments and proposes the following changes: - Include additional description in Chapter 1 regarding this - Substantially revise Chapter 8 to define "Delta as an evolving place", characterize unique attributes (drawing from DPC's ESP) and describe some key changes in land use, crop cover, and economy for the region
Definition of co-equal goals and determination of "significance" for covered actions.		
5 th staff draft (various commentors), DPC-ESP Chapters 1 and 3	7. Better definitions needed of co-equal goals, Delta as Place, other terms identified in statute.	Staff agrees with these comments and proposes the following changes: - Revise definitions of (1) "Water Supply

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		<p>Reliability", (2) "Protecting, Enhancing and Restoring Delta ecosystem", (3) "Delta as Evolving Place", (4) "Government-sponsored Flood Control Program"</p> <ul style="list-style-type: none"> - Use definitions to clarify strategies for achieving co- goals and for meeting other requirements of Delta Reform Act .
BDCP and the Delta Plan		
<p>5th staff draft</p> <p>Chapter 4, pp. 86-87</p>	<p>8. Concerns about treatment of BDCP; language considered pre-decisional; DSC should not assess consistency of BDCP projects with Delta Plan. Need to clarify what will happen if BDCP not completed.</p>	<p>Staff partially agrees with comments and proposes to:</p> <ul style="list-style-type: none"> - Provide a more thorough discussion of BDCP <p>Staff proposes no additional changes as additional issues related to these comments will be addressed once BDCP is completed.</p>
Flow-related comments		
<p>5th staff draft (primarily water agencies/districts and numerous focused comments from San Joaquin River Group Authority)</p> <p>Chapter 5, pp 112-114</p>	<p>9. Ecosystem restoration approach in Chapter 5 is too flow centric.</p>	<p>Staff partially agreed with comments and recommends the following:</p> <ul style="list-style-type: none"> - Revise text in Chapter 5 to emphasize all stressors, though flow will remain a primary factor discussed in the chapter.
	<p>10. Don't encourage SWRCB to undergo parallel development of flow objectives concurrent with BDCP flow efforts.</p>	<p>Staff does not agree with these comments. SWRCB supports this language and is working on objectives in conjunction with BDCP process.</p>
	<p>11. Additional language required regarding SWRCB's process and regulatory role and clarification needed on definitions of Delta flow requirements, criteria, objectives - not used properly in draft</p>	<p>Staff agrees that clarification is needed and proposes the following changes:</p> <ul style="list-style-type: none"> - Propose additional language regarding SWRCB's regulatory authority and process for revision of the water quality

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	Delta Plan.	plan for Delta - Clarify use of and definitions for flow criteria, objectives and standards as used in draft Delta Plan.
Finance Plan and Funding		
5 th draft plan (from various entities) Chapter 9, general comments on chapter	12. Concerns expressing need for clearer funding plan; need more funding for various elements of plan; opposition to various fees	Staff agree with most comments and propose the following course of action: - Addressing most comments received through development of finance plan subsequent to completion of Delta Plan.